

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI

HENRY HARRIS

PLAINTIFF

VERSUS

CIVIL ACTION No.: 2014-00156 (3)

JACKSON COUNTY, MISSISSIPPI;
JACKSON COUNTY BOARD OF SUPERVISORS,
Individually and collectively;
JACKSON COUNTY SHERIFF'S OFFICE;
JACKSON COUNTY NARCOTICS TASK FORCE;
SHERIFF MIKE BYRD,
Individually and in his official capacity;
OFFICER KEN MCCLENIC,
Individually and in his official capacity;
And OTHER UNKNOWN JOHN and JANE DOES, A-Z,
Also in their official and individual capacities

FILED

JUL 24 2014

JOE W. MARTIN, JR. CLERK
BY *[Signature]* D.C.

DEFENDANTS

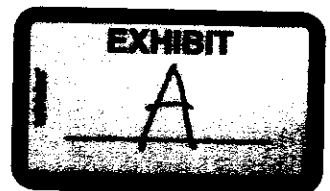
COMPLAINT

THE DEFENDANTS ARE HEREBY PUT ON NOTICE THAT THE
PLAINTIFF WILL EXERCISE HIS RIGHT TO AND DEMANDS A TRIAL BY JURY

Comes, now the Plaintiff, Henry Harris, by and through his counsel of record, Michael W. Crosby, and for good and sufficient cause of action files this, his Complaint, and in support of the same would state, aver and give notice of the following:

PRELIMINARY STATEMENT

1. This is a federal civil rights action brought as a result of what the Plaintiff alleges was a blatant violation of, inter alia, the federal civil, constitutional and human rights of the Plaintiff. On or about July 10, 2013, the Defendants herein, individually and in concert with one another, in their official and individual capacities did willfully, wantonly and with reckless disregard for the rights privileges and immunities of the Plaintiff, while acting under color of state authority, did wrongfully arrest and assault Henry Harris, while utilizing inappropriate and unnecessary



force, and thereafter, intentionally and publicly defaming the Plaintiff thereby causing him to suffer substantial defamation of character through both libel and slander, loss of liberty, and wrongfully interfering with the Plaintiff's right to the pursuit of happiness. The Defendants orchestrated such actions as part and parcel of a course of conduct that resulted from a patterned practice that has become so pervasive within the with the ranks of the Defendants that the same has risen to the level of policy which the Defendants, JACKSON COUNTY, MISSISSIPPI; JACKSON COUNTY BOARD OF SUPERVISORS; JACKSON COUNTY SHERIFF'S OFFICE; JACKSON COUNTY NARCOTICS TASK FORCE; SHERIFF MIKE BYRD, Individually and in his official capacity; and OFFICER KEN MCCLENIC, Individually and in his official capacity; have condoned and encouraged.

2. As a direct and proximate consequence of the actions of the Defendants, the Plaintiff has been damaged and otherwise suffered injury for which he is entitled to be compensated in an amount to be determined by a jury but not less than \$10,000,000.00.

PARTIES

3. The Plaintiff is an adult resident citizen of Alabama residing at 10460 Bay Point Boulevard, Grand Bay, AL. At all times material hereto, the Plaintiff was a resident of the Alabama. Jackson County, Mississippi is the County wherein the alleged wrongdoing transpired.

4. The Defendant, JACKSON COUNTY, Mississippi, is a political subdivision which pursuant to statute may be served by effecting service of process upon Terry Miller, Chancery Clerk, at his regular place of business being 3104 Magnolia Street, Pascagoula, Mississippi 39567.

5. The Defendant, JACKSON COUNTY BOARD OF SUPERVISORS, may be served with lawful process pursuant to the applicable statutes governing the same at c/o John McKay, Board President, Jackson County Board of Supervisors, 2915 South Canty Street, Pascagoula, Mississippi 39567. The Board of Supervisors, individually and collectively, are sued herein in their official and individual capacities for allowing such illegal and blatantly offensive practices to continue in this County without exercising the requisite level of oversight and supervision as vested in it by the State of Mississippi. As a result of the conduct of the JACKSON COUNTY BOARD OF SUPERVISORS, the constitutionally protected rights, privileges and immunities of the Plaintiff were violated. Consequently, this Defendant is liable to the Plaintiff for the damages so sustained.

6. The Defendant, JACKSON COUNTY SHERIFF'S OFFICE, may be served with lawful process pursuant to the applicable statutes governing the same at c/o Sheriff Charles Britt, 3104 Magnolia Street, Pascagoula, Mississippi 39567. As a result of the conduct of the JACKSON COUNTY SHERIFF'S OFFICE the constitutionally protected rights, privileges and immunities of the Plaintiff were violated. Consequently, this Defendant is liable to the Plaintiff for the damages so sustained.

7. The Defendant, JACKSON COUNTY NARCOTICS TASK FORCE, may be served with lawful process pursuant to the applicable statutes governing the same at c/o Sheriff Charles Britt, Jackson County Sheriff's Office, 3104 Magnolia Street, Pascagoula, Mississippi 39567. Furthermore, Defendants who comprise the Jackson County Narcotics Task Force are also sued in their official and individual capacities for having violated the rights, privileges and immunities of the Plaintiff and such individuals may be served with lawful process once they have been properly identified at their regular place of business or at their homes. As a result of the conduct

of the JACKSON COUNTY NARCOTICS TASK FORCE the constitutionally protected rights, privileges and immunities of the Plaintiff were violated. Consequently, this Defendant(s) is liable to the Plaintiff for the damages so sustained.

8. The Defendant, SHERIFF MIKE BYRD, is sued in his official and individual capacities and may be served with lawful process pursuant to the applicable statutes governing the same at his home address or wherever he may be found. As a result of his conduct, Sheriff Mike Byrd violated the constitutionally protected rights, privileges and immunities of the Plaintiff. Consequently, this Defendant is liable to the Plaintiff for the damages so sustained.

9. The Defendant, OFFICER KEN MCCLENIC, is sued in his official and individual capacities and may be served with lawful process pursuant to the applicable statutes governing the same at the Jackson County Sheriff's Office located at 3104 Magnolia Street, Pascagoula, Mississippi 39567. As a result of his conduct, Officer Ken McClenic violated the constitutionally protected rights, privileges and immunities of the Plaintiff. Consequently, this Defendant is liable to the Plaintiff for the damages so sustained.

10. The unknown Defendants, John and Jane Does A-Z, are unknown individuals whose conduct violated the Plaintiff's rights, privileges and immunities as guaranteed by the Constitution of the United States of America, the federal statutes under which this claim is prosecuted and the laws of the State of Mississippi. These officers and or individuals acting in concert with state authorities once identified through the discovery process acted in their official and individual capacities and as such they are liable to the Plaintiff for the wrongs perpetrated against him.

JURISDICTION and VENUE

11. This honorable Court has jurisdiction over the parties and the subject-matter herein as this is the County where the wrongs perpetrated against the Plaintiff by the Defendants, jointly and severally, were committed. The wrongs herein committed constituted violations of federal constitutional and statutory protections which invoke the original jurisdiction of this Honorable Court. This Court also has jurisdiction to adjudicate the pendent state claims raised herein.

FACTS

12. On or about July 10, 2013, Henry Harris and several friends and acquaintances were at a building located next to Club Unique, specifically 6811 Frederick Street, Moss Point, MS 39567 when it was raided by the Jackson County Narcotics Task Force operating under the direction of Officer Ken McClenic. Around 7:30 or 8:00 p.m., a flash bomb was thrown into the premises. Henry Harris ran outside and was ordered to get on his stomach. Mr. Harris explained that he has had back surgery and was getting down onto his stomach as quickly as possible when he was hit in the back and elbow with a metal baton by Officer Ken McClenic. As he fell, Henry Harris landed on his stomach and snapped his triceps tendon. Mr. Harris immediately exclaimed that he was injured. After being on the ground for 10-12 minutes, Henry Harris was allowed to stand up. The knot on his elbow was extremely swollen and an ambulance was called. He was transported to Singing River Hospital Emergency Room. Henry Harris was served with a copy of the search warrant two weeks after the raid, and he was never charged with any crimes in connection with this incident.

COUNT 1.

13. The Defendants herein, jointly and severally and while acting in concert with one another, conspired to violate the Plaintiff's constitutional and statutorily protected rights, privileges and immunities when they, while acting under color of state law and authority deprived the Plaintiff of life, liberty, and the continued pursuit of happiness without both substantive and/or procedural due process of law, detaining him, physically assaulting him, and defaming his character without trial, and through the exercise of unnecessary and unlawful use of force when they initially detained him all in violation of 42 USC Sections 1983 and 1985(3).

14. As a direct and proximate consequence of the illegal conduct of the Defendants, jointly and severally and while acting in concert with one another, the Plaintiff suffered injury to his person and reputation and he is therefore entitled to be compensated for the same in an amount to be determined by a jury but not less than \$10,000,000.00.

COUNT 2.

15. The defendants herein, the Jackson County Board of Supervisors, collectively and individually, and Sheriff Mike Byrd violated the Plaintiff's rights, privileges and immunities to be free from such illegal conduct perpetrated under color of state law when they failed to properly supervise, train, and oversee the conduct their officers and agents herein thus they violated 42 USC Section 1986 which was intended to prevent the same kind of illegal conduct that cause the Plaintiff to suffer harm herein.

16. As a direct and proximate consequence of the defendants conduct herein as set forth in Count 2 of this Complaint the defendants failure to affirmatively carry out their supervisory and oversight responsibilities in accordance with the applicable laws governing the same, the

Plaintiff was injured and suffered irreparable loss to his person, property, liberty and reputation and he is therefore entitled to compensation in an amount to be determined by a jury but not less than \$10,000,000.00.

COUNT 3

17. The Defendants herein violated several of the Plaintiff's state protected rights when they engaged in conduct that injured the Plaintiff as a result of their negligent and grossly negligent conduct. Such conduct includes but is not limited to, false arrest, false imprisonment, slander and libel, assault, battery, criminal conversion, common law civil conspiracy, humiliation and negligent infliction of mental and emotional distress.

18. As a direct and proximate consequence of the Defendants conduct herein they are jointly and severally liable to the Plaintiff for having caused him injury when they breached their state law duties and responsibilities to not cause the Plaintiff and others similarly situated harm or injury. Consequently, the Plaintiff was injured and suffered irreparable loss to his person, property and reputation and he is therefore entitled to compensation in an amount to be determined by a jury but not less than \$10,000,000.00.

COUNT 4.

19. The Defendants are jointly and severally liable to the Plaintiff and are required to pay the Plaintiff's reasonable attorney fees and related litigation expenses, to include expert's fees for having violated several of the Plaintiff's civil rights as protected by such federal civil rights statutes as 42 USC Sections 1983, 1985, and 1986. Such fees and expenses are to be awarded separate and apart from any award to the Plaintiff for his actual compensatory damages and the same should only be limited by the fair comparable market value of prevailing in such similar

cases with equal complexity, difficulty and novelty, noting the Plaintiff's counsel is herein acting as a private attorney general as the same was intended by Congress when these laws were enacted.

PRAYER FOR RELIEF

20. WHEREFORE, PREMISES CONSIDERED, the Plaintiff, Henry Harris, prays that upon the filing of this Complaint that this Honorable Court will advance this matter on the trial docket and order immediately that discovery be expedited so that the Plaintiff may try and identify John and Jane Does A-Z and amend his complaint as soon as they are known to allow this matter to proceed to a full trial on the merits preferably within the next nine (9) months.


(a.) The Plaintiff seeks compensatory damages in the amount of \$10,000,000.00 against the Defendants herein, jointly and severally and in their official and individual capacities, for the violation of his federal constitutional, civil and human rights.

(b.) The Plaintiff seeks compensatory damages in the amount of \$10,000,000.00 for the deprivation of his state law rights that were violated of and by the Defendants herein jointly and severally and in their official and individual capacities.

(c.) The Plaintiff seeks punitive damages against the Defendants, jointly and severally and in their official and individual capacities, in the amount of \$10,000,000.00 for the willful, wanton and reckless disregard for the rights, privileges and immunities of the Plaintiff such rights, privileges and immunities being guaranteed to the Plaintiff and persons similarly situated by the Constitution of the United States of America and the statutes supporting the same.

- (d.) The Plaintiffs seeks a lode-star award of all of attorney fees, together with all litigation expenses and expert fees as a prevailing party herein, regardless of the amount of the award returned to the Plaintiff by a jury because of the difficulty and complexity of this case.
- (e.) The Plaintiff prays for such other relief that is just, proper and equitable in the premises herein, and if the Plaintiff has prayed for inappropriate, incomplete or inadequate relief, the Plaintiff asks permission of this Honorable Court to allow the Plaintiff to amend this complaint. The Plaintiff prays for such general relief as the Court deems just, equitable and proper herein.

RESPECTFULLY SUBMITTED, this the 24th day of July, 2014.



MICHAEL W. CROSBY (MS BAR NO.: 7888)
2111 25th AVENUE
GULFPORT, MISSISSIPPI 39501
TEL: 228-865-0313
FAX: 228-865-0337
michaelwcrosby@bellsouth.net

COVER SHEET Civil Case Filing Form <i>(To be completed by Attorney/Party Prior to Filing of Pleading)</i>		Court Identification Docket # <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;">30</div> <div style="border: 1px solid black; padding: 2px;">CE</div> </div> <div style="display: flex; justify-content: space-around; font-size: small;"> <div>County #</div> <div>Judicial District</div> <div>Court ID (CH, CI, CO)</div> </div> <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;">07</div> <div style="border: 1px solid black; padding: 2px;">24</div> <div style="border: 1px solid black; padding: 2px;">14</div> </div> <div style="display: flex; justify-content: space-around; font-size: small;"> <div>Month</div> <div>Date</div> <div>Year</div> </div>		Case Year <div style="border: 1px solid black; padding: 2px; display: inline-block;">2014</div>	Docket Number <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;">00</div> <div style="border: 1px solid black; padding: 2px;">15</div> <div style="border: 1px solid black; padding: 2px;">6</div> </div> <div style="border: 1px solid black; padding: 2px; margin-top: 5px; display: flex; justify-content: space-around;"> <div style="width: 20px; height: 20px;"></div> <div style="width: 20px; height: 20px;"></div> <div style="width: 20px; height: 20px;"></div> </div> <div style="text-align: center; font-size: x-small;">Local Docket ID</div>	
Mississippi Supreme Court Administrative Office of Courts		Form AOC/01 (Rev 2009)		This area to be completed by clerk		Case Number if filed prior to 1/1/94
In the <u>CIRCUIT</u> Court of <u>JACKSON</u> County <u>—</u> Judicial District <u>—</u>						
Origin of Suit (Place an "X" in one box only)						
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"><input checked="" type="checkbox"/> Initial Filing</div> <div style="width: 50%;"><input type="checkbox"/> Reinstated</div> <div style="width: 50%;"><input type="checkbox"/> Foreign Judgment Enrolled</div> <div style="width: 50%;"><input type="checkbox"/> Transfer from Other court</div> <div style="width: 50%;"><input type="checkbox"/> Remanded</div> <div style="width: 50%;"><input type="checkbox"/> Reopened</div> <div style="width: 50%;"><input type="checkbox"/> Joining Suit/Action</div> <div style="width: 50%;"><input type="checkbox"/> Appeal</div> <div style="width: 50%;"><input type="checkbox"/> Other</div> </div>						
Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form						
Individual <u>HARRIS</u> <u>HENRY</u> <div style="display: flex; justify-content: space-between; font-size: x-small;"> <div>Last Name</div> <div>First Name</div> <div>Maiden Name, if applicable</div> <div>M.I.</div> <div>Jr/Sr/III/IV</div> </div> <div style="font-size: x-small;"> <input type="checkbox"/> Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____ Estate of _____ </div> <div style="font-size: x-small;"> <input type="checkbox"/> Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____ D/B/A or Agency _____ </div>						
Business _____ <div style="font-size: x-small;"> Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated <input type="checkbox"/> Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: _____ D/B/A _____ </div>						
Address of Plaintiff <u>10460 Bav Point Boulevard, Grand Bay, AL 36541</u>						
Attorney (Name & Address) <u>MICHAEL W. CROSBY, 2111 25th Avenue, Gulfport, MS 39501</u> MS Bar No. <u>7888</u> <input type="checkbox"/> Check (x) if Individual Filing Initial Pleading is NOT an attorney Signature of Individual Filing: _____						
Defendant - Name of Defendant - Enter Additional Defendants on Separate Form						
Individual _____ <div style="display: flex; justify-content: space-between; font-size: x-small;"> <div>Last Name</div> <div>First Name</div> <div>Maiden Name, if applicable</div> <div>M.I.</div> <div>Jr/Sr/III/IV</div> </div> <div style="font-size: x-small;"> <input type="checkbox"/> Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____ Estate of _____ </div> <div style="font-size: x-small;"> <input type="checkbox"/> Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____ D/B/A or Agency _____ </div>						
Business <u>JACKSON COUNTY, MISSISSIPPI, c/o Terry Miller, Chancery Clerk, 3104 Magnolia Street, Pascagoula, MS 39567</u> <div style="font-size: x-small;"> Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated <input type="checkbox"/> Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below: _____ D/B/A _____ </div>						
Attorney (Name & Address) - If Known _____ MS Bar No. _____						
Damages Sought: Compensatory \$ _____ Punitive \$ _____ <input type="checkbox"/> Check (x) if child support is contemplated as an issue in this suit.* <small>*If checked, please submit completed Child Support Information Sheet with this Cover Sheet</small>						
Nature of Suit (Place an "X" in one box only)						
Domestic Relations <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Diff. <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA) <input type="checkbox"/> Other _____ Appeals <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Dept Employment Security <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other _____		Business/Commercial <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Business Dissolution <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Replevin <input type="checkbox"/> Other _____ Probate <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Other _____		Children/Minors - Non-Domestic <input type="checkbox"/> Adoption - Contested <input type="checkbox"/> Adoption - Uncontested <input type="checkbox"/> Consent to Abortion Minor <input type="checkbox"/> Removal of Minority <input type="checkbox"/> Other _____ Civil Rights <input type="checkbox"/> Elections <input type="checkbox"/> Expungement <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief/Prisoner <input checked="" type="checkbox"/> Other Deprivation of Right Contract <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____ Statutes/Rules <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Other _____		Real Property <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Eviction <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Tax Sale: Confirm/Cancel <input type="checkbox"/> Title Boundary or Easement <input type="checkbox"/> Other _____ Torts <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Mass Tort <input type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Product Liability <input type="checkbox"/> Subrogation <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI
JUDICIAL DISTRICT, CITY OF

Docket No. _____
 File Yr _____ Chronological No. _____ Clerk's Local ID _____

Docket No. If Filed
 Prior to 1/1/94 _____

DEFENDANTS IN REFERENCED CAUSE - Page 1 of 4 Defendants Pages
IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Defendant #2:

Individual: _____
 Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
 Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
 D/B/A _____

Business JACKSON COUNTY BOARD OF SUPERVISORS, 2915 South Canty Street, Pascagoula, MS 39567
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:
 D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #3:

Individual: _____
 Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
 Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
 D/B/A _____

Business JACKSON COUNTY SHERIFF'S OFFICE, c/o Sheriff Charles Britt, 3104 Magnolia Street, Pascagoula, MS 39567
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:
 D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #4:

Individual: _____
 Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
 Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
 D/B/A _____

Business JACKSON COUNTY NARCOTICS TASK FORCE, c/o Sheriff Charles Britt, 3104 Magnolia Street, Pascagoula, MS 39567
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:
 D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI
JUDICIAL DISTRICT, CITY OF

Docket No. _____ - _____ Docket No. If Filed
File Yr Chronological No. Clerk's Local ID Prior to 1/1/94

**DEFENDANTS IN REFERENCED CAUSE - Page 2 of 2 Defendants Pages
 IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

Defendant # 5 :

Individual: BYRD MIKE ()
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

___ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

___ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

___ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ___ Not an Attorney(✓) ___

Defendant # 6 :

Individual: MCCLLENIC KEN ()
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

___ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

___ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A 3104 Magnolia Street, Pascagoula, MS 39567

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

___ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ___ Not an Attorney(✓) ___

Defendant # 7 :

Individual: Unknown John & Jane Does A-2 ()
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

___ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

___ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

___ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ___ Not an Attorney(✓) ___